

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

State of Texas,

Plaintiff,

v.

The United States of America et al.,
Defendants.

No. 2:24-cv-00086-Z

DECLARATION OF SARAH KEYTON

Pursuant to 28 U.S.C § 1746, I, Sarah Keyton, duly affirm under penalty of perjury as follows:

1. I am over 18 years of age, have personal knowledge of the matters set forth herein, and am competent to make this declaration.
2. My name is Sarah Keyton, and I serve as the Deputy Commissioner of Administration of the Texas Higher Education Coordinating Board. I have served in this capacity since December 2023, and prior to that, I served as the Associate Commissioner of Administration. My responsibilities for the Texas Higher Education Coordinating Board include oversight of the agency divisions responsible for budget preparation and funding analysis.
3. The Texas Higher Education Coordinating Board was created in 1965 by the Texas Legislature to provide leadership, guidance, expertise, and resources to improve the efficiency and

quality of higher education in Texas. The Coordinating Board provides oversight, for 148 public colleges, universities, and health-related institutions serving almost 1.4 million students in Texas.

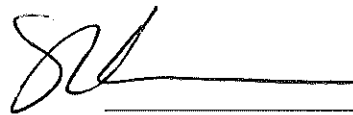
4. All of Texas' public institutions of higher education receive federal funds and are subject to the requirements of Title IX.

5. The Texas Higher Education Coordinating Board is a state educational agency covered by Title IX.

6. If any educational program or activity at one of Texas' public institutions of higher education is determined not to be in compliance with the requirements of Title IX, that could threaten the entity's ability to receive federal funding.

7. The loss of federal funds to Texas' public institutions of higher education could require these institutions to either eliminate certain educational services currently offered using federal funds or require them to seek new funding to pay for those programs or activities.

8. I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read 'SK', followed by a horizontal line.

Sarah Keyton

Dated: May 10, 2024.